

Exhibit C

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

RIDGEVIEW MEDICAL CENTER AND CLINICS

#2733

SUBJECT: CODE OF ETHICAL BEHAVIOR AND BUSINESS**ORIGINATING DEPT:** Administration**DISTRIBUTION DEPTS:** All**ACCREDITATION/REGULATORY STANDARDS:**

Original Date: 8/96

Revision Dates: 2/99, 2/02, 3/06, 1/08, 4/15

Reviewed Dates: 8/96, 10/03, 1/11, 1/14

APPROVAL:

Administration: _____

Board Chair: _____

POLICY:

Ridgeview Medical Center (RMC) accepts that it has a responsibility to the patients and the community it serves to uphold the highest standards of ethical, professional behavior. In accepting this responsibility the RMC code of ethical behavior, as established by the Board of Directors, is driven by the organizations mission, vision, values, and guiding principles. RMC recognizes that it is the responsibility of every board member, employee, physician, and volunteer to act in a manner that is consistent with the guidelines set forth in this code and to that end, dedicate themselves to carrying out the mission of this organization and shall:

1. Hold paramount the safety, health and welfare of the public in the performance of professional duties.
2. Act in such a manner as to uphold and enhance personal and professional honor, integrity and the dignity of the profession.
3. Collaborate with and support other professionals in carrying out Ridgeview Medical Center's mission.
4. Build professional reputations/relationships on the merit of services and refrain from competing unfairly with others.
5. Accept as a personal duty the responsibility to keep up to date on emerging issues and to conduct themselves with professional competence, fairness, impartiality, efficiency, and effectiveness.
6. Respect the structure and responsibilities of the board of directors, provide them with facts and advice as a basis for their making policy decisions, and uphold and implement policies adopted by the board of directors.

MARKETING:

Ridgeview Medical Center has defined the framework for ethical behavior and output of marketing practices.

The *Community Relations Department* shall have the responsibility for overseeing all marketing activities associated with the medical center, home health services, and clinics and shall maintain the standards and guidelines for ethical marketing behavior.

In addition to Ridgeview Medical Center's Guiding Principles, the following marketing principles shall be observed:

- A. **Truth in advertising** - all advertising done by RMC will represent the products and services and level of licensure and accreditation as they actually exist. Claims of efficiency or appropriateness will not be exaggerated.

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

- B. Truthful response to inquiry** - questions asked by customers, family, media or others will be answered openly and honestly. If circumstances dictate that an honest answer would violate confidentiality or good business practice, the individual answering the question will decline to answer the question.
- C. Protection of patient's confidentiality** - the rights of patients to confidentiality will be respected. Information about patients will not be released except as described in policies related to confidentiality. Patients and visitors will not be displayed in media products by RMC without prior written approval of the individual(s). All reasonable attempts will be made to assure that outside media will not talk to or take pictures of patients or families without prior consent.
- D. Protection of staff confidentiality** - pictures of staff will not be used in media without prior consent. Staff will not be required to participate in interviews with outside media or be in pictures released to outside media without prior consent of the staff member.

BILLING:

Ridgeview Medical Center shall charge patients only for the services which they receive, regardless of insurance coverage. Patients and third party payers are billed uniformly. RMC provides assistance to patients seeking understanding and clarification of the cost of their care. All initial patient billing is itemized and includes the dates of service. Ridgeview Home Health Services provides itemized bills as appropriate. Charges are determined using comparative charge data and the Medicare allowable charges. RMC attempts to resolve all concerns and objections patients may have regarding their bill expeditiously and without real or perceived harassment. All patient account balances will be resolved using the Accounts Receivable Control Guidelines. For those patients who are unable to pay for their care, RMC has developed a financial aid program. This program is available to all patients, regardless of race, color, creed, religion, national origin, disability, sex, age, or status in regards to public assistance.

Ridgeview Medical Center patients sometimes question anticipated cost for scheduled services. Finance and senior management make a report available to the Business Office staff that indicates price ranges of the most common services. This report is also utilized in cases where prepayment is required or discussed.

All patients are given access to and/or copies of the Insurance Processing Information and Patient Financial Responsibility brochure at the time of admission and/or before or after care/services have been rendered.

Ridgeview Home Health Services patients are provided with information regarding payment and the billing process at the initiation of services. Information is included in writing on the appropriate service agreement or consent form. An applicable rate sheet is included in the patient's welcome packet as a reference.

ACCESS TO SERVICES:

(Admission/Discharge/Transfer/Protective Services)

Admission to RMC is based upon the patient's condition, defined admission criteria and services required. Scopes of Service have been developed that guide the patient types admitted to RMC. The Coronary Intensive Care and Maternal Child Health units have admission and discharge criteria based on objective assessment of the care needs of the patient. Home Health Services have additional criteria based on the patient's service area, home environment and support needs. Individuals shall be accorded impartial access to treatment or accommodations that are available or

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

medically indicated, regardless of race, creed, sex, national origin, physical handicap, or sources of payment for care. Ridgeview does not deny admission to people with a contagious disease, including, but not limited to: HIV, MRSA, VRE, TB, and Hepatitis B.

Discharge from RMC is based upon the patient's condition and is only accomplished by an order from a physician. Discharge criteria from InterQual may be used to objectively determine a patient's discharge readiness.

Transfer from RMC will occur for those patients who have medical conditions or who are in active labor and require specialized care not available or appropriate to be provided at RMC. Transfers will occur only after completion of the medical screening examination. Consent by the patient or legally responsible individual who has authority for consent is required for all transfers. Transfers will not be based on race, color, creed, religion, national origin, disability, sex, age, or the ability to pay. Transfers are conducted according to EMTALA laws. Home Health Services have specific transfer, discharge and referral criteria.

All patients have the right to protective services. Protective services are addressed in the following policies:

#5019 – *Vulnerable Adults: Identifying and Reporting*

#2726 – *Domestic/Partner -Abuse/Violence*

#5220 – *Child Abuse/Neglect: Identifying and Reporting*

#2545 – *Advance Directives*

#5020 – *Do Not Resuscitate (DNR)/ Provider Order for Life Sustaining Treatment (POLST)*

Patients will not be denied access to RMC services based upon patient or hospital economics.

CONFLICT OF INTEREST:

Definition: A conflict of interest is defined in the RMC Employee Reference Handbook as "use of a position or Ridgeview information such as customer or patient lists, equipment or literature for gain" on one's own behalf. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of RMC business dealings. Conflict of interest issues can arise at all levels within RMC.

1. Conflicts of interest shall not be allowed to exist or remain in place in those instances where the actions or activities of an individual on behalf of the hospital involve:
 - A. Obtaining a personal gain or advantage by an employee of RMC.
 - B. An adverse effect upon the interests of the RMC.
 - C. Obtaining, by a third party, an improper or illegal gain or advantage to the detriment of RMC.

Conflict of interest shall include, but is not limited to:

 - a) Holding a financial interest in, or engaging in activities on a consulting basis, or otherwise, with a firm which provides services, supplies, or equipment to RMC, or with a firm which is in competition with RMC, or is engaged in activities in which RMC may have a present or future interest.
 - b) Speculating or dealing in services, equipment, or supplies which are purchased by RMC if the individual's decision to engage in such activity is based substantially on information available to the individual because of such individual's position with RMC, or if the individual stands to gain financially due to his/her position with RMC, or where

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

- such speculations or dealings would be contrary to RMC's best interests.
- c) Borrowing money from suppliers or contractors. (This does not apply to transactions with banks or commercial lending institutions which do not involve concessions to the individual because of such individual's position with the hospital).
 - d) Business entertainment can only be provided or received consistent with what is reasonable under the circumstances, as a token of appreciation and for hospitality, and not for the purpose of influencing the business behavior of the recipient. RMC employees, departments or groups representing RMC are not to accept gifts, entertainment, premiums, food, personal favors or other incentives from a current vendor or a potential new vendor if it could be perceived as substantial enough to influence the selection of goods or services for RMC. Similarly, employees should refrain from giving or accepting excessive gifts to or from vendors, customers or other business associates. Ridgeview employees should never accept cash gifts from vendors, patients or customers.
 - e) Acquisition by purchase or lease of real estate in which it is known that RMC might have an interest, or which may appreciate in value because of RMC's possible interest in nearby property. An employee shall not acquire financial interest in a hospital or business when the acquisition of such hospital or business is or should be under consideration by RMC.
 - f) Specifically, breakfast, lunch, dinner and other food stuffs may not be provided by a supply vendor for a department or group in any Ridgeview setting or at any time of day. An exception may be made by the department director and/or administration if the supplier is providing an education program for the purpose of continuing staff education.
2. If an employee has an influence on transactions involving purchases, contracts, or leases, or is involved in another conflicting circumstance as detailed above, he or she must disclose to the appropriate RMC manager, director, or vice president as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties. Ridgeview, in its sole discretion, determines whether outside activities create a conflict of interest.

GRIEVANCE:

In accordance with Minnesota State Law (MSA Sections 144.691 and 144.651, subd. 20), the Patient Bill of Rights will be posted in the Emergency Room, Admitting Office, the Same Day Surgery Unit and the Cashier's Office. Written notices, ("Patient Bill of Rights") will be distributed to all in-patients as they are admitted to the hospital. RMC affords the patient and/or family an opportunity to discuss with an administrative representative, the grievances they perceive thus providing a means of documentation and follow-up. Refer to the Grievance Policy for items that may be subject to the grievance mechanism.

CONFLICT RESOLUTION:

The Board of Directors, Administration, the Medical Staff and RMC Department Directors/Managers agree to resolve any differences in recommendations related to RMC policies/procedures and /or medical staff credentialing activities in a reasonable timeframe and in accordance with Ridgeview Medical Center's Guiding Principles. The Board of Directors, Administration, the Medical Staff and RMC Directors/Managers do not withhold its approval of appropriate bylaws, policies and /or procedures.

RMC000916

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

CLINICAL DECISIONS:

Ridgeview Medical Center and Clinic's code of ethical behavior protects the integrity of clinical decision making, regardless of how the hospital compensates or shares financial risk with its leaders, managers, clinical staff, and licensed independent practitioners. An Ethics Committee has been established, that serves as a resource for organizational ethical information, consultation and materials. (Please refer to Policy #2711 – *Ethics Committee*)

ADDITIONAL RESOURCES:

Additional code of conduct and conflict of interest issues are outlined in the RMC Corporate Compliance Plan Exhibit A Corporate Compliance Code of Conduct, RMC Personnel Handbook and Board of Directors by-laws.

Uncontrolled